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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA :
- v. - :
MAYUR RELE, :
Defendant. :
- - - - - x

19 Cr. 842 (RA)

PROTECTIVE ORDER

RONNIE ABRAMS, District Judge:

WHEREAS, the Government has represented that certain materials subject to discovery in this case pursuant to Rule 16 of the Federal Rules of Criminal Procedure ("Rule 16") contain or reflect personal identification information (including but not limited to names, addresses, Passport numbers, dates of birth, phone numbers, e-mail addresses, and bank account numbers);

WHEREAS, the Government has represented that certain materials subject to discovery in this case pursuant to Rule 16 of the Federal Rules of Criminal Procedure ("Rule 16") contain or reflect confidential business information (including but not limited to information pertaining to a business's network, critical systems, data storage, and information technology);

WHEREAS the Court finds that a protective order is warranted to shield individuals and a business from potential invasions of privacy and/or economic harm;
IT IS HEREBY ORDERED THAT:

1. Discovery material produced by the Government in this action that contains or reflects personal identification information is deemed "Confidential Material."

2. Discovery material produced by the Government in this action that contains or reflects confidential business information is deemed "Confidential Material."

3. Confidential Material disclosed to the defendant or to the defendant's counsel during the course of proceedings in this action:

(a) Shall be used by the defendant or his counsel only for purposes of this action;

(b) Shall not be copied or otherwise recorded by the defendant;

(c) Shall not be distributed or disclosed in any form by the defendant or his counsel except as set forth in paragraph 3(d) below;

(d) May be disclosed only by the defendant's counsel and only to the following persons (hereinafter "Designated Persons"):

(i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by the defendant's counsel;

(ii) independent expert witnesses, investigators or advisors retained by the defendant or on his behalf in connection with this action;

(iii) fact witnesses or other third-parties interviewed or consulted by the defendant's counsel or a member of the defense team in the course of investigating the case;

(iv) such other persons as hereafter may be authorized by the Court upon such motion by the defendant; and

(e) Shall be returned to the Government following the conclusion of this case together with any and all copies thereof, or shall be destroyed together with any and all copies thereof, which destruction defendant's counsel shall verify in writing.

4. Defense counsel shall provide a copy of this Order to any Designated Persons to whom Confidential Material is disclosed pursuant to paragraph 3(d). Designated Persons shall be subject to the terms of this Order.


5. The provisions of this Order shall not be construed as preventing the disclosure or use of any information in any motion, hearing, trial, or sentencing proceeding held in this

action or to any judge or magistrate of this Court for purposes of this action (except that Confidential Material, if submitted in connection with a written motion to this Court, shall be filed under seal pending further order of this Court); nor shall it be construed to prevent the Government from providing, showing, and/or describing Confidential Material to law enforcement personnel assisting in the investigation and prosecution of this matter.

Dated: New York, New York

July 13, 2020

SO ORDERED.



THE HONORABLE RONNIE ABRAMS
UNITED STATES DISTRICT JUDGE